



South Coast  
Air Quality Management District

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**FAXED: NOVEMBER 16, 2007**

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Mr. Don Dooley  
City of Whittier  
Department of Planning Services  
132 Penn Street  
Whittier, CA 90602

Dear Mr. Dooley:

**Draft Environmental Impact Report (DEIR) for the  
Uptown Whittier Specific Plan  
(July 2007)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment  
SS: CB

LAC071009-04  
Control Number

## **Draft Environmental Impact Report (DEIR) for the Uptown Whittier Specific Plan**

### **1. Screening Tables:**

On page 5.4-14 the lead agency recommends as significance thresholds the screening tables in Chapter 6 of the SCAQMD's CEQA Air Quality Handbook. The SCAQMD has not supported the use of these screening tables for a number of years. Instead, the SCAQMD recommends that construction and operational air quality impacts for all projects be quantified and the results compared to the applicable mass daily regional significance thresholds shown in Table 5.4-5 and, at the project-specific level, to the applicable localized significance thresholds (refer to the following URL for additional information on localized significance thresholds: [www.aqmd.gov/ceqa/handbook/LST/LST.html](http://www.aqmd.gov/ceqa/handbook/LST/LST.html)).

### **2. URBEMIS 2007:**

The lead agency used URBEMIS 2002 for the air quality analysis and included only the operational emissions output in the appendix. The lead agency should be aware that URBEMIS 2007 is now available and it is recommended that the model be used to revise the air quality analysis for the current as well as be used for future projects instead of URBEMIS 2002. The advantages to using the URBEMIS 2007 model is that it calculates PM 2.5 and CO<sub>2</sub> emissions, uses EMFAC 2007 on-road emission factors, and the OFFROAD 2007 emissions factors for off-road equipment. URBEMIS 2007 can be accessed at the following website: [www.urbemis.com](http://www.urbemis.com)

Please include both the construction and operational emissions output printout of the URBEMIS 2007 run in the appendix to facilitate review.

### **3. PM 2.5 Thresholds:**

Table 5.4-5 on page 5.4-14, which shows the mass daily emissions thresholds for the proposed project, does not show emissions for PM 2.5. The SCAQMD has requested that lead agencies quantify PM 2.5 emissions since approximately January 2007. As already noted the URBEMIS 2007 model quantifies PM 2.5 emissions. Alternatively, guidance for quantifying PM 2.5 emissions can also be found at the following website: [www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html).

### **4. Project Mitigation:**

In addition to the mitigation measures listed on pages.4.4-21 and 5.4-22, the lead agency should consider the following mitigation measures to reduce VOC emissions from coating applications.

- Restrict the number of gallons of coatings used per day.
- Encourage water-based coatings or other low-emitting alternatives.

- Consider requiring the use of coatings with a lower VOC content than 100 grams per liter, as required by SCAQMD Rule 1113- Architectural Coatings.
- Consider requiring paint contractors to use hand applications instead of spray guns.

Additionally, the lead agency should consider other measures discussed in Chapter 11 of the SCAQMD's Handbook or on the SCAQMD's CEQA website at:

[www.aqmd.gov/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/handbook/mitigation/MM_intro.html).